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August 21, 2007

Dr. Peter T. Dalleo  
Clerk of the Court  
United States District Court  
844 N. King Street  
Wilmington, DE 19801

**RE: St. Louis v. Morris, et al.**  
**C.A. No. 06-236-SLR**

Dear Dr. Dalleo:

I am writing in reference to Plaintiff James St. Louis's letter, which was filed on August 20, 2007. [D.I. 59]. In his letter, Mr. St. Louis asserts that he was denied legal assistance at his deposition on August 10, 2007. I have enclosed for the Court's reference the pages from Mr. St. Louis's deposition where he made his statement regarding his lack of representation and undersigned counsel's response.

Undersigned counsel is available if the Court requires additional information.

Respectfully,

/s/ Eileen Kelly

Eileen Kelly  
Deputy Attorney General

Enclosure

cc: Mr. James St. Louis (w/enclosure)  
SBI # 446518

James St. Louis

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JAMES ST. LOUIS,	)	
	)	
Plaintiff,	)	
	)	Civil Action No.
v.	)	06-236-SLR
	)	
LT. CHERYL MORRIS, et al,	)	
	)	
Defendants.	)	

Deposition of JAMES ST. LOUIS taken pursuant to notice at the Delaware Correctional Center, 1181 Paddock Road, Smyrna, Delaware, beginning at 10:00 a.m. on Wednesday, August 10, 2007, before Robert Wayne Wilcox, Jr., Registered Professional Reporter and Notary Public.

APPEARANCES:

JAMES ST. LOUIS (pro se)  
SBI# 446518  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, Delaware 19977  
for himself,

EILEEN KELLY, ESQ.  
STATE OF DELAWARE DEPARTMENT OF JUSTICE  
820 North French Street - 6th Floor  
Wilmington, Delaware 19801  
for the Defendants.

CORBETT & WILCOX  
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1 JAMES ST. LOUIS,

2 the witness herein, having first been  
3 duly affirmed on oath, was examined and  
4 testified as follows:

5 BY MS. KELLY:

6 Q. Okay. Mr. St. Louis, was there anything you  
7 wanted to put on the record before we get started?

8 A. Yes.

9 Q. Okay. Go ahead.

10 A. First, I want to let it be known that I did  
11 ask for a legal advisor to call me and advise me during  
12 this deposition, and apparently, it's not going to  
13 happen. I want it to be known that I'm not being  
14 represented by an attorney whatsoever, and I object to  
15 the unfair system that is putting a seasoned, skilled  
16 trial lawyer against an individual who is unskilled and  
17 lacks the evidentiary knowledge of the rules of the  
18 judicial system that could bring forth improper evidence  
19 without giving me proper representation.

20 Q. Mr. St. Louis, I would like to put on the  
21 record that I move for lead to depose you with the court,  
22 and Judge Robinson granted that motion, knowing that you  
23 were unrepresented. You filed the motion, at least one,  
24 for representation, which has been denied. And as I told

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1 you, I feel that, under Judge Robinson's ruling, I do not  
2 have the authority to provide you with legal counsel --  
3 that's already been decided -- or with legal assistance  
4 at the deposition.

5 All right. You're here today for your  
6 deposition in the case St. Louis versus Morris, and I  
7 represent the defendants, who are Morris, Klein, Knight,  
8 Legates, Lehman, Johnson and Boring.

9 Have you ever been deposed before,  
10 Mr. St. Louis?

11 A. No, ma'am.

12 Q. Okay. Let me just go over a few basic things.

13 First of all, we can only speak one at a  
14 time, because the court reporter can only take down one  
15 person at a time speaking. So I would ask that you wait  
16 until I finish my question, and I'll wait till you finish  
17 answering before I start to talk again.

18 Second, all responses must be out loud.  
19 He can't take down a nod or a shake of the head or  
20 uh-huh. So you need to articulate what it is that you  
21 want to say.

22 If I ask you a question and you go ahead  
23 and answer it, I'm going to assume that you understood  
24 what I was asking you. So if at any time my questions

Condensed  
Transcript

Exhibits